

# EXHIBIT H

## PAUL W. FLOWERS & ASSOCS.

Paul W. Flowers, Principal  
Licensed to Practice in Ohio and California  
Certified Appellate Law Specialist, Ohio State Bar Assn.

Louis E. Grube, Associate  
Licensed to Practice in Ohio

Terminal Tower, Suite 1910  
50 Public Square  
Cleveland, Ohio 44113-2216  
Telephone: (216) 344-9393  
Fax: (216) 344-9395  
Emails: [pwf@pwfco.com](mailto:pwf@pwfco.com)  
[leg@pwfco.com](mailto:leg@pwfco.com)

Website: [www.pwfco.com](http://www.pwfco.com)

September 27, 2018

**VIA E-MAIL ONLY: hgarrard@bbga.com**

Henry G. Garrard, III, Esq.  
**BLASINGAME, BURCH, GARRARD & ASHLEY, P.C.**  
440 College Ave., Suite 320  
Athens, GA 30601

RE: *In re: Ethicon, Inc. Pelvic Repair System Products Liability Lit.*,  
U.S. Dist. Court, S.D. W.V., MDL No. 2327

Dear Mr. Garrard:

I am writing to you in your capacity as the Chairman of the Common Benefit Fee and Cost Committee ("FCC"). We will be submitting objections tomorrow on behalf of our client, Anderson Law Offices, to the FCC's preliminary recommendations in accordance with Section E of PTO #262. Because little information has been disclosed supporting these findings, we have been unable to fully detail and substantiate our concerns with the common benefit fee allocation process that has been conducted thus far. In the interests of both transparency and fundamental principles of due process, we are therefore requesting the following:

1. An opportunity to review the original and revised time and expense entries submitted in support of the claims for common benefit awards by both members and non-members of the FCC;
2. Any documents or data identifying the time and expense entries submitted by any FCC member or non-member that were rejected by the FCC;
3. Any documents or data identifying the hourly rates approved and utilized by the FCC for purposes of calculating a common benefit fee award to an FCC member or non-member;

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4. Any documents or data identifying the multipliers or other adjustments approved and utilized by the FCC for purposes of calculating a common benefit fee award to an FCC member or non-member;
5. An opportunity to review any standards, guidelines, methodologies, or other materials bearing upon how hourly rates were approved and utilized during the calculation of the common benefit awards for FCC members and non-members;
6. An opportunity to review any standards, guidelines, methodologies, or other materials bearing upon how multipliers or other adjustments were approved and utilized during the calculation of the common benefit awards for FCC members and non-members.
7. An opportunity to review any statements, receipts, or other materials submitted by an FCC member or non-member in support of a claim for litigation expenses and costs.

We will certainly be receptive to any sensible approaches the FCC may propose for sharing this information confidentially and with minimal undue burden or expense. I am further requesting a reasonable opportunity to supplement our objections once we have been able to review and evaluate the FCC's productions. Please do not hesitate to contact me if you have any questions with regard to the nature and scope of these requests.

Very Truly Yours,



Paul W. Flowers

PWF/cls

cc: Benjamin Anderson, Esq. (via email: [ben@andersonlawoffices.net](mailto:ben@andersonlawoffices.net))  
Richard Gottlieb, Esq. (via email: [rgottlieb@lewisglasser.com](mailto:rgottlieb@lewisglasser.com))  
Jay Arceneaux, Esq. (via email: [wjarceneaux@lewisglasser.com](mailto:wjarceneaux@lewisglasser.com))